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1	Daniel I. Aquino (NSBN 12682) Emily Dubansky (NSBN 16228) McDONALD CARANO LLP 2300 West Sahara Avenue, Suite 1200
	Emily Dubansky (NSBN 16228)
2	McDONALD CARANO LLP
	2300 West Sahara Avenue, Suite 1200
3	Las Vegas, Nevada 89102 Telephone: (702) 873-4100
	Telephone: (702) 873-4100
4	daguino@mcdonaldcarano.com
	edubansky@mcdonaldcarano.com
5	
	Attorneys for Defendant
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

KAYLA GAGNON and LAUREN COLON.

Plaintiffs,

v.

REVIVE HEALTH SENIOR CARE MANAGEMENT, LLC, a domestic limited liability company, doing business as ALTA SKILLED NURSING AND REHABILITATION CENTER; and DOES I-XX inclusive,

Defendant.

Case No. 3:25-cv-00035-ART-CSD

STIPULATION AND ORDER TO EXTEND DEFENDANT'S DEADLINE TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' FIRST AMENDED **COMPLAINT**

(Third Request)

Defendant Revive Health Senior Care Management, LLC doing business as Alta Skilled Nursing and Rehabilitation Center ("Revive" or "Defendant") and Plaintiffs Kayla Gagnon and Lauren Colon ("Plaintiffs"), by and through their respective counsel of record, hereby agree, stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiffs' First Amended Complaint by 30 days, from July 7, 2025 to August 8, 2025.

The Court previously granted extensions of Defendant's deadline to respond to the Amended Complaint from May 6, 2025 to June 6, 2025, and from June 6, 2025 to July 7, 2025. This is the third request to extend the responsive pleading deadline for the Amended Complaint.

McDONALD (M. CARANO 2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA 89102 PHONE 702.873.4100 • FAX 702.873.9966

The parties request this extension for Defendant to answer or otherwise respond to the Amended Complaint because the parties are continuing to actively engage in global settlement discussions. Counsel for both parties have continued to exchange settlement proposals since the last extension, and are continuing to engage in negotiations. The undersigned represent that this stipulation is not designed for purposes of delay.

Dated: July 1, 2025.

McDONALD CARANO LLP

By: /s/ Daniel I. Aquino

Daniel I. Aquino (NSBN 12682)
Emily Dubansky (NSBN 16228)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
daquino@mcdonaldcarano.com
edubansky@mcdonaldcarano.com

Attorneys for Defendant

JEPSEN LAW, PLLC

By: /s/ Kendra J. Jepsen

Kendra J. Jepsen (NSBN 14065) 405 Marsh Avenue Reno, Nevada 89509 Telephone: (775) 376-7070 kendra@jepsenlawnv.com

Attorney for Plaintiffs

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 2, 2025